

Lambda Communications

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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FCC - MAIL ROOM

Before the
Federal Communications Commission
Washington, DC 20544

PR Docket 92-235

In the Matter of

Replacement of Part 90
by Part 88 to Revise
the Private Land Mobile
Radio Services and Modify
the Policies Governing them.

To: The Commission

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~~FEB 24 1993~~

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COMMENTS

Lambda Communications

submits its comments

in response to the Commission's notice of Proposed Rule
Making in this proceeding, concerning:

1. Power Restrictions on Fixed Stations at Higher Elevations.
2. Channel Splitting.

Complete comments are provided on the following pages.

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List A B C D E

1. Power Restrictions

The power restrictions proposed in Section 88.429 and listed in Table C-3 would be devastating to communications in rural, mountainous areas. Mountain top repeaters and remote base stations are essential because of their relatively unobstructed line of sight to the surrounding area. Even with present power outputs, their range is generally restricted by surrounding terrain. To reduce power to 5

area.

2. Channel splitting

Adequate bandwidth is essential for intelligible and reliable voice communications. The need to create more channels must be balanced with the need for communication quality. The goal should be to optimize use of the band, not simply to reduce bandwidth by arbitrary factors.

Narrowband equipment which is economical and has acceptable voice communication quality is not currently available. Some equipment is on the market, but it costs four to five times as much and the quality is poor. It takes many years to debug new technology before it is acceptable to the mass market. We feel that it is overly optimistic to legislate change and hope that technology will catch up. Simply turning back the deviation in current transmitters may force them to work within the rules, but it would seriously degrade communication quality.

In rural areas, the frequencies are not used up and there isn't the need to make more space in the VHF and UHF bands. Keeping costs down and quality high is more important than making room for expensive technology which may not be reliable. Rural communities must spread their expense over a small population base. Communications, police, fire, medical facilities, airports etc. all cost more per capita. While the FCC may not regard the cost of the proposed changes to the taxpayer as being very high, it has to be taken in context. There have been numerous legislated changes in the past few years concerning environmental protection, safety, protection against discrimination, etc. which have substantially added to the tax burden and to the cost of doing business. The FCC's proposed changes are one more expense to a rural community, but with no tangible benefit.

We suggest that other portions of the spectrum be allocated for innovative narrowband technology, rather than trying to dismantle the VHF and UHF bands. Rural areas such as ours depend on reliable and cost effective radio communications, which would be seriously jeopardized by the proposed rule changes.

Respectfully submitted,


Tom L. Bunch


Sheila A. Crawford Bunch

Owners
Lambda Communications